

EXHIBIT 2

Storm, Vivian (x7624)

From: Assmus, Richard M. <RAssmus@mayerbrown.com>
Sent: Tuesday, October 21, 2014 10:18 AM
To: Storm, Vivian (x7624); Mangi, Adeel A. (x2563)
Cc: ~ramiller@paulweiss.com; ~ratkins@paulweiss.com; Zalesin, Steven A. (x2110); Cavanagh, Frank (x2311); ~dhl@carmodymacdonald.com; Zarlenga, Carmine R.; Young, Kristine M.; Roodman, David (daroodman@BryanCave.com)
Subject: RE: Nestlé Purina PetCare Company v. Blue Buffalo Company Ltd. -- pricing documents

Vivian—

I don't think the parties are in a position right now to define the full scope of the pricing documents that may be needed. As we noted, the parties may be differently positioned in view of their legal claims, size, product lines and record keeping. Purina's offer as expressed in my letter from Friday has not changed.

Rich

++++
Richard M. Assmus
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(312) 701-8623
rassmus@mayerbrown.com

From: Storm, Vivian (x7624) [mailto:vstorm@pbwt.com]
Sent: Tuesday, October 21, 2014 8:23 AM
To: Assmus, Richard M.; Mangi, Adeel A. (x2563)
Cc: ~ramiller@paulweiss.com; ~ratkins@paulweiss.com; Zalesin, Steven A. (x2110); Cavanagh, Frank (x2311); ~dhl@carmodymacdonald.com; Zarlenga, Carmine R.; Young, Kristine M.; Roodman, David (daroodman@BryanCave.com)
Subject: RE: Nestlé Purina PetCare Company v. Blue Buffalo Company Ltd. -- pricing documents

Rich:
I'm not sure we understand your latest proposal. Could you please clarify the scope of the reciprocal exchange you have in mind? Are you offering to produce documents sufficient to show Nestlé Purina's pricing for its dry food products, including price lists, price schedules, price changes, price announcements, and discounts from list prices? Please let us know your position as soon as possible so that we can discuss it with our client in advance of tomorrow's conference.
-Vivian

From: Assmus, Richard M. [mailto:RAssmus@mayerbrown.com]
Sent: Monday, October 20, 2014 5:35 PM
To: Mangi, Adeel A. (x2563)
Cc: ~ramiller@paulweiss.com; ~ratkins@paulweiss.com; Zalesin, Steven A. (x2110); Storm, Vivian (x7624); Cavanagh, Frank (x2311); ~dhl@carmodymacdonald.com; Zarlenga, Carmine R.; Young, Kristine M.; Roodman, David (daroodman@BryanCave.com)
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Adeel—

As the briefing to date on the motions to compel has demonstrated, reciprocity needs to be judged in part by the nature of each party's claims. With respect to pricing documents, for example, different product lines of each party may be relevant. However, setting aside that and other reasons why each party's production of pricing documents may not be totally reciprocal—for example differences based on the way each party keeps its information—we are proposing that the parties discuss the pricing information their respective damages expert need and make a reciprocal exchange of such information.

Rich

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From: Mangi, Adeel A. (x2563) [<mailto:aamangi@pbwt.com>]
Sent: Friday, October 17, 2014 5:49 PM
To: Assmus, Richard M.
Cc: ~ramiller@paulweiss.com; ~ratkins@paulweiss.com; Zalesin, Steven A. (x2110); Storm, Vivian (x7624); Cavanagh, Frank (x2311); ~dhl@carmodymacdonald.com; Zarlenga, Carmine R.; Young, Kristine M.; Roodman, David (daroodman@BryanCave.com)
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Thank you. So that we have clarity on the pending issues as to our motion to compel, however, we need to know if Purina is offering a reciprocal scope on pricing documents. You can do that by agreeing to produce the same pricing documents you seek from us, or by agreeing to narrow the scope of your demand to us to make it consistent with what you are now offering to produce. Either way, whether Purina is being consistent bears on our consideration of your proposal. Please let us know your position. Thank you.

On Oct 17, 2014, at 6:40 PM, "Assmus, Richard M." <RAssmus@mayerbrown.com> wrote:

Adeel—

We are happy to discuss limitations on the pricing documents we seek, although we had understood that issue had been resolved at least with respect to Purina's current requests for pricing documents. As you know, we did not move to compel any additional pricing documents from Blue Buffalo based on what we understand Blue Buffalo has agreed to produce already in response to the current document requests.

Rich

From: Mangi, Adeel A. (x2563) [<mailto:aamangi@pbwt.com>]
Sent: Friday, October 17, 2014 5:13 PM

To: Assmus, Richard M.; ~ramiller@paulweiss.com; ~ratkins@paulweiss.com; Zalesin, Steven A. (x2110); Storm, Vivian (x7624); Cavanagh, Frank (x2311); ~dhl@carmodymacdonald.com
Cc: Zarlenga, Carmine R.; Young, Kristine M.; Roodman, David (daroodman@BryanCave.com)
Subject: RE: Nestlé Purina PetCare Company v. Blue Buffalo Company Ltd. -- pricing documents

Richard: Thank you for your proposal, which we will consider. So we can fully evaluate it, are you proposing to reciprocally narrow the pricing documents you seek from Blue Buffalo?

Best regards,

Adeel Abdullah Mangi
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From: Assmus, Richard M. [<mailto:RAssmus@mayerbrown.com>]
Sent: Friday, October 17, 2014 6:09 PM
To: Mangi, Adeel A. (x2563); ~ramiller@paulweiss.com; ~ratkins@paulweiss.com; Zalesin, Steven A. (x2110); Storm, Vivian (x7624); Cavanagh, Frank (x2311); ~dhl@carmodymacdonald.com
Cc: Zarlenga, Carmine R.; Young, Kristine M.; Roodman, David (daroodman@BryanCave.com)
Subject: Nestlé Purina PetCare Company v. Blue Buffalo Company Ltd. -- pricing documents

Please see the attached letter.

Rich

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